



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

June 26, 2007

Mr. Richard Hull
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Hill 78 Area-Remainder (GECD160)
Proposed Additional Sampling Location**

Dear Mr. Hull:

The General Electric Company (GE) has recently completed its third supplemental predesign investigation soil sampling activities at the Hill 78 Area-Remainder Removal Action Area (RAA), conducted in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). Those activities were proposed in GE's *Supplemental Sampling Proposal*, submitted to the U.S. Environmental Protection Agency (EPA) on February 16, 2007 and conditionally approved by EPA on April 26, 2007. Sampling activities were conducted between June 5 and 7, 2007 and preliminary analytical results were communicated to EPA shortly after receipt from the laboratory.

As you are aware, at sample location RAA9-A13, located north of the curve in Tyler Street Extension (see Figure 1, attached), a total polychlorinated biphenyl (PCB) concentration of 40 ppm was detected in the soil sample collected from the 6- to 15-foot depth increment. This concentration was significantly higher than the PCB concentrations detected in other soil borings installed in this area (the preliminary analytical results of most soil samples showed PCB concentrations below 1 ppm). To further assess this result, GE proposes to install one additional soil boring, to be designated as RAA9-13N, approximately 25 foot north of sampling location RAA9-A13, as shown on Figure 1. Although this boring is proposed solely to assess the extent of elevated PCB concentrations detected from the 6- to 15-foot depth increment at boring RAA9-A13, analysis of the 0- to 1-foot and 1- to 6- foot depth increments is also proposed at location RAA9-A13N since, due to the steep slope between the two locations, those depth increments appear to correspond to portions of the elevation of the 6- to 15-foot sample from boring RAA9-A13. To minimize the clearing of vegetation in this area and since it is not certain if the proposed location will be accessible with a sampling rig, GE proposes to manually drive the soil sampler and to attempt to collect soil samples from the 0- to 1-foot, 1- to 6-foot and 6- to 15-foot depth increments, although the deeper sample depth may be reduced subject to limitations of the sampling equipment. Each soil sample will be analyzed for PCBs. The additional sampling will be performed in accordance with GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP).

Based on the results from this sample, GE will evaluate the need for and scope of any additional sampling. The results of this evaluation, and, if necessary, a proposal for additional sampling in this area are proposed to be included in GE's Third Supplemental Data Letter, which will provide the results of the other investigations conducted pursuant to GE's February 16, 2007 proposal, and other information required by EPA in its April 26, 2007 conditional approval letter.

The Third Supplemental Data Letter is currently scheduled to be submitted to EPA by July 10, 2007. However, GE requests that the submittal date of that letter be extended so that the sample results from location RAA9-A13N proposed herein can be incorporated. Specifically, GE requests that the Third Supplemental Data Letter be submitted one month after EPA approval of this additional sampling proposal. That schedule will allow GE to clear vegetation and check for the presence of underground utilities, conduct the sampling and analysis activities, validate the analytical results, and incorporate them into the letter report.

Please call Andrew Silfer or me if you have any questions about this proposal or other upcoming activities at the Hill 78 Area-Remainder RAA.

Sincerely,



Richard W. Gates
Remediation Project Manager

Attachment

cc: Tim Conway, EPA *
Dean Tagliaferro, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Linda Palmieri, Weston
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP *
Jane Rothchild, MDEP *
Nancy E. Harper, MA AG *
Dale Young, MA EOE *
Mayor James Ruberto, City of Pittsfield
Pittsfield Commissioner of Public Health

Thomas Hickey, Director, PEDDA
Jeffrey Bernstein, BCL Law
Theresa Bowers, Gradient
Michael Carroll, GE *
Rod McLaren, GE *
Andrew Silfer, GE
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Tim Eglin, Purenergy I, LLC
Public Information Repositories
GE Internal Repositories

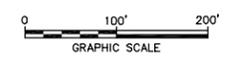
**(Copy of letter only)*

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- LEGEND:**
- K11-7-2 PROPERTY ID
 - APPROXIMATE SITE BOUNDARY
 - HILL 78 AND BUILDING 71 CONSOLIDATION AREAS (NOT PART OF HILL 78 AREA-REMAINDER RAA)
 - PROPERTY LINE
 - EASEMENT LINE
 - FENCE LINE
 - EDGE OF SWALE
 - INDEX ELEVATION CONTOUR LINE
 - INTERMEDIATE ELEVATION CONTOUR LINE
 - EDGE OF WOODS
 - LIGHT POLE
 - UTILITY POLE
 - BUSH/TREE/SHRUB
 - GAS MARKER
 - MANHOLE
 - SANITARY MANHOLE
 - CATCH BASIN
 - DRAIN MANHOLE
 - ELECTRIC MANHOLE
 - WATER VALVE
 - FIRE HYDRANT
 - OHW OVERHEAD WIRE
 - D STORM SEWER (DRAINAGE) LINE
 - E UNDERGROUND ELECTRIC LINE
 - S SANITARY LINE
 - W WATER LINE
 - G GAS LINE
 - GE-OWNED PAVED AREA
 - BUILDING/STRUCTURE
 - APPROXIMATE LOCATION OF BAND SURROUNDING SUBSURFACE UTILITIES (25 FEET WIDE ON EACH SIDE OF UTILITY)
 - 78-7 • EXISTING PCB SOIL BORING LOCATION
 - H78SS-1 ▲ EXISTING PCB SURFACE SAMPLE LOCATION
 - EXISTING SURFACE WATER SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - EXISTING SEDIMENT SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - RAA9-A13N ● PROPOSED SAMPLING LOCATION
 - RAA9-X5 ● 3RD SUPPLEMENTAL SAMPLING LOCATION
 - (1-6) ○ APPENDIX IX+3 SAMPLE DEPTH
 - SB-1 ○ BORING LOCATIONS FOR RE-ROUTING OF SANITARY AND STORM PIPELINES
 - RAA9-X6 ● CONTINGENCY SOIL BORING LOCATION (NOT ANALYZED)

- NOTES:**
1. MAPPING BASED ON ELECTRONIC FILE (S2149W01.DWG) OF SURVEY BY FORESIGHT LAND SERVICES, DATED 3/16/06. UTILITY LOCATIONS BASED ON AVAILABLE RECORD DATA AND VISIBLE FIELD EVIDENCE AND ARE NOT REPRESENTED AS BEING EXACT OR COMPLETE.
 2. SAMPLES FROM ALL LOCATIONS WILL BE COLLECTED FOR PCB ANALYSIS FROM DEPTHS OF 0-1, 1-6, AND 6-15 FEET, EXCEPT FOR LOCATIONS RAA9-G2S AND RAA9-I2 (WHERE NO PCB ANALYSES ARE REQUIRED).



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**SUPPLEMENTAL PRE-DESIGN INVESTIGATION
 WORK PLAN FOR HILL 78 AREA-REMAINDER
 SUPPLEMENTAL SOIL
 CHARACTERIZATION
 SAMPLE LOCATIONS**

